IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

MARQUI STITH SR., individually and on behalf of all others similarly situated,

Plaintiff.

v.

Case No. 1:21-cv-436-LO-IDD

TIPS EAST, LLC, et al.

Defendants.

JOINT NOTICE OF SETTLEMENT

The Parties have reached an agreement in principle as to the resolution of this litigation and are in the process of drafting the Settlement Agreement. Upon finalizing the Settlement Agreement, the Parties anticipate submitting a motion for preliminary approval, requesting the Court's approval of the Parties' class action settlement.

WHEREFORE, the Parties provide their Joint Notice of Settlement, and respectfully request that the Court continue the stay in this matter to May 18, 2022 to give the parties time to draft and present settlement documents to the court for approval.

Respectfully Submitted,

/s/ Jay Forester

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing pleading was served via the Court's ECF filing system.

/S/ Gregg C. Greenberg